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10 Attorneys for Plaintiff RICHARD FRIEDMAN

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

14 RICHARD FRIEDMAN, an individual,  
15 Plaintiff,

16 vs.

17 HANS ZIMMER, individually, and dba  
18 REMOTE CONTROL SONGS;  
TWENTIETH CENTURY FOX FILM  
19 CORPORATION; FOX SEARCHLIGHT  
PICTURES, INC.; FOX  
20 ENTERTAINMENT GROUP, INC.; NEW  
REGENCY PRODUCTIONS, INC.;  
21 MONARCHY ENTERPRISES, S.A.R.L.,  
individually, and doing business as  
22 REGENCY ENTERPRISES; RIVER  
ROAD ENTERTAINMENT, LLC; PLAN  
23 B ENTERTAINMENT, INC.; REMOTE  
CONTROL PRODUCTIONS, INC.; SONY  
24 MUSIC ENTERTAINMENT; IMAGEM  
PRODUCTION MUSIC LLC, individually,  
25 and dba 5 ALARM MUSIC and also doing  
business as CYPRESS CREEK MUSIC;  
26 DOES ONE through TEN, inclusive,

27 Defendants.

Case No. 2:15-CV-00502 GHK (E)

**PLAINTIFF RICHARD  
FRIEDMAN'S NOTICE OF  
MOTION AND MOTION FOR  
LEAVE TO FILE A SECOND  
AMENDED COMPLAINT**

Date: January 11, 2016  
Time: 9:30 a.m.  
Courtroom: 650

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1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on January 11, 2016 at 9:30 a.m., Plaintiff  
3 Richard Friedman ("Plaintiff") will and hereby does move this Court, Honorable  
4 George H. King, Courtroom 650, located at 255 East Temple Street, Los Angeles,  
5 CA 90012-3332, for an order granting Plaintiff leave to file a Second Amended  
6 Complaint ("SAC") against defendants HANS ZIMMER, et al., and DOES 1 to 10.  
7 The proposed SAC drops several parties who have been either dismissed from the  
8 case and/or entered into settlement agreements with Plaintiff, drops several claims  
9 which were dismissed by this Court in its Order on Defendants' Motion to Dismiss  
10 Plaintiff's First Amended Complaint, corrects the name of one Defendant, and  
11 changes the status of Plaintiff from beneficial owner to legal owner of the  
12 copyrighted musical composition. The proposed SAC is attached to the Declaration  
13 of Maxwell M. Blecher, filed concurrently herewith, as Exhibit 1.

14 This motion is brought pursuant to Federal Rule of Civil Procedure 15(a).  
15 Plaintiff makes this request so that it can clarify and streamline the claims in the  
16 operative First Amended Complaint. Good cause exists for the Court to grant leave  
17 to file an amended complaint as the SAC significantly narrows and clarifies the  
18 claims and parties in this case. Plaintiff's counsel intends to ease the burden on the  
19 Court and the parties by focusing and streamlining the claims and parties at issue.

20 As set forth more fully in the attached memorandum of points and authorities,  
21 and the declaration of Maxwell M. Blecher served and filed concurrently herewith,  
22 this motion is made following an e-mail exchange in which Plaintiff's counsel  
23 attached the proposed SAC asking if Defendants would stipulate to its filing. A  
24 stipulation and proposed order was attached to the same email. A true and correct  
25 copy of the email is attached to the Declaration of Maxwell M. Blecher as Exhibit 2.  
26 Defendants' counsel did not respond to Plaintiff's request to stipulate to the filing of  
27 the SAC, thereby necessitating that Plaintiff seek leave from the Court.

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1 This Motion is based on the orders, pleadings, and papers already on file in  
2 this action, and upon such oral or other argument and other evidence as the Court  
3 may consider in the event the Court hears oral argument on this motion.

4 Dated: November 24, 2015

BLECHER COLLINS  
PEPPERMAN & JOYE, P.C.  
MAXWELL M. BLECHER  
THEO "JOHN" GIOVANNI ARBUCCI

By: /s/ Maxwell M. Blecher

Maxwell M. Blecher  
Attorneys for Plaintiff RICHARD  
FRIEDMAN

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